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## VIA ELECTRONIC FILING

Hon. James L. Garrity, Jr.  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green  
New York, New York 10004

Re: El San Juan City Island on 5<sup>th</sup> Ave LLC  
Case No. 20-10103-jlg

Dear Judge Garrity:

Please be advised that my firm represents La Casa Quinta L.P., owner of real property located at 1429 Fifth Avenue, New York, New York 10035 (the "Property"). Debtor, El San Juan City Island on 5<sup>th</sup> Ave LLC ("Debtor") occupies the commercial space at the Property.

This letter is submitted in support of an application pursuant to 11 USC 362(c)(4)(a)(ii), et seq., which states: "on the request of a party in interest, the court shall promptly enter an order confirming that no stay is in effect."

The history of this Debtor is more fully set forth in the accompany declaration. Nonetheless, the instant bankruptcy filing is the third in a twelve month period, the first two were dismissed (19-10904-mg and 19-13192-jlg).

Therefore, it is most respectfully requested that this Court issue the Proposed Order.

Respectfully submitted,

Gregory S. Liss

Enc.

cc. Norma E. Ortiz, Esq., attorney for Debtor  
El San Juan City Island on 5<sup>th</sup> Ave LLC  
United States Trustee